

James E. Cecchi
John M. Agnello
Donald A. Ecklund
CARELLA, BYRNE, CECCHI
OLSTEIN, BRODY & AGNELLO, P.C.
5 Becker Farm Road
Roseland, New Jersey 07068
Tel: (973) 994-1700

Lionel Z. Glancy
Robert V. Prongay
Casey E. Sadler
GLANCY PRONGAY & MURRAY LLP
1925 Century Park East, Suite 2100
Los Angeles, California 90067
(310) 201-9150

Attorneys for Lead Plaintiff Bin Qu

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CHAO SUN, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

DAQING HAN, XIAOLI YU, HONG LI,
MING LI, LIAN ZHU, GUANGHUI CHENG,
GUOBIN PAN, GUANGJUN LU, YUANPIN
HE, MAZARS CPA LIMITED, MAZARS Srl,
WEISERMAZARS LLP, and TELESTONE
TECHNOLOGIES CORPORATION,

Defendants.

Case No. No. 2:15-cv-00703-JMV-MF

**NOTICE OF MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND
REIMBURSEMENT OF LITIGATION
EXPENSES**

**TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS
OF RECORD HEREIN:**

PLEASE TAKE NOTICE that, pursuant to the Court's Order Preliminarily Approving Settlement and Providing for Notice ("Preliminary Approval Order," Dkt. No. 68), on March 6, 2018 at 10:30 a.m., Co-Lead Counsel,¹ Carella, Byrne, Cecchi Olstein, Brody & Agnello, P.C. and Glancy Prongay & Murray LLP, before the Hon. John Michael Vazquez, U.S.D.J. in Courtroom PO 3 at the U.S. Courthouse and Post Office Building, 2 Federal Square, Newark, New Jersey 07102, shall move the Court to enter an order awarding Co-Lead Counsel's attorneys' fees and reimbursement of litigation expenses.

This motion is based on this Notice of Motion; the memorandum of points and authorities in support thereof; the Declaration of Donald A. Ecklund in Support of: (I) Lead Plaintiff's Motion for Final Approval of the Proposed Settlement, Class Certification, and the Plan of Allocation; and (II) Co-Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; the exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.

Co-Lead Counsel is unaware of any opposition to this motion. Pursuant to the Preliminary Approval Order, any objection to Lead Counsel's application for an award of attorneys' fees and reimbursement of litigation expenses must be filed on or before a February 13, 2018. To date, no objections have been filed.

¹ All capitalized terms that are not otherwise defined herein have the same meanings as set forth in the Stipulation of Settlement dated February 8, 2017 ("Stipulation") that was filed with the Court on February 24, 2017. Dkt. No. 64-3.

A proposed order granting the requested relief will be submitted with the reply papers after the deadline for objecting to Co-Lead Counsel's application for an award of attorneys' fees and reimbursement of litigation expenses has passed.

Dated: January 30, 2018

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.

By: s/ James E. Cecchi

James E. Cecchi

John M. Agnello

Donald A. Ecklund

5 Becker Farm Road

Roseland, New Jersey 07068

(973) 994-1700

Lionel Z. Glancy

Robert V. Prongay

Casey E. Sadler

GLANCY PRONGAY & MURRAY LLP

1925 Century Park East, Suite 2100

Los Angeles, California 90067

(310) 201-9150

*Attorneys for Lead Plaintiff Bin Qu and Co-
Lead Counsel for the Class*

PROOF OF SERVICE

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On January 30, 2018, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the District of New Jersey, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 30, 2018.

s/ James E. Cecchi
James E. Cecchi